

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TAYLOR GILBERT,

Plaintiff,

v.

INDEED, INC., AARON SCHWARTZ,
ALEXA WACHSTEIN, GABRIELLE
VERBARO, and MICHELLE LAM

Defendants.

Civil Action No. 1:20-cv-03826 (LJL)

**DEFENDANTS INDEED, INC., ALEXA WACHSTEIN, GABRIELLE VERBARO, AND
MICHELLE LAM’S NOTICE OF MOTION TO COMPEL ARBITRATION, DISMISS
CLAIMS AGAINST THEM, OR IN THE ALTERNATIVE STAY THE PROCEEDINGS,
AND AWARD COSTS AND FEES**

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Courtney S. Stieber, Esq., together with Exhibits A through J annexed thereto; Memorandum of Law In Support; and upon all the pleadings and proceedings herein, Defendant Indeed, Inc. (“Indeed”), by and through its undersigned counsel, Seyfarth Shaw LLP and Waller Lansden Dortch & Davis, LLP, and Defendants Alexa Wachstein, Gabrielle Verbaro, and Michelle Lam, by and through their undersigned counsel, Waller Lansden Dortch & Davis, LLP, (collectively with Indeed, the “Indeed Defendants”) will move this Court, at a date and time to be determined by the Court, before the Honorable Lewis J. Liman, United States District Judge, at the United States District Court for the Southern District of New York, Thurgood Marshall U.S. Courthouse located at 40 Foley Square, New York, New York 10007, for an Order: (i) granting the Indeed Defendants’ motion to compel arbitration pursuant to pursuant to the Federal Arbitration Act, 9 U.S.C. § 1 *et seq.* and Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure; and (ii) granting such other and further relief as the Court may deem just and proper.

Dated: New York, New York
July 17, 2020

Respectfully submitted,
SEYFARTH SHAW LLP

By /s/ Courtney S. Stieber
Courtney S. Stieber
620 Eighth Avenue, 32nd Floor
New York, New York 10018-1405
cstieber@seyfarth.com
Telephone: (212) 218-5500
Facsimile: (212) 218-5526

Attorneys for Defendant Indeed, Inc.

WALLER LANSDEN DORTCH & DAVIS,
LLP

By /s/ Aron Z. Karabel
Aron Z. Karabel
511 Union Street, Suite 2700
Nashville, Tennessee 37219
aron.karabel@wallerlaw.com
Telephone: (615) 244-6380
Facsimile: (615) 244-6804

Co-counsel for Defendant Indeed, Inc.

*Attorneys for Defendants Alexa Wachstein,
Gabrielle Verbaro and Michelle Lam*

CERTIFICATE OF SERVICE

I, Courtney S. Stieber, an attorney, do hereby certify that on this July 17, 2020, I served a copy of the NOTICE OF MOTION, DECLARATION OF COURTNEY S. STIEBER, ESQ., TOGETHER WITH EXHIBITS A THROUGH J ANNEXED THERETO, AND MEMORANDUM OF LAW IN SUPPORT OF THE INDEED DEFENDANTS' MOTION TO COMPEL ARBITRATION, DISMISS CLAIMS AGAINST THEM, OR IN THE ALTERNATIVE STAY THE PROCEEDINGS, AND AWARD COSTS AND FEES via ECF, which sent a copy of this filing to all counsel of record.

/s/ Courtney S. Stieber
Courtney S. Stieber